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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Joshua A. Martinez,

Defendant.

Case No. 2:21-cr-00219-APG-DJA

**Government's Second Notice of Expert
Testimony – LVMPD Forensic Scientist
Allison Rubino**

CERTIFICATION: This notice is timely filed.

The United States provides notice of intent to offer the expert witness testimony of Las Vegas Metropolitan Police Department Forensic Scientist Allison Rubino in its case-in-chief. She will testify about DNA recovered from firearms seized in this case and her opinion and the bases and reasons for her opinion regarding the likelihood that defendant Martinez's DNA was among the recovered DNA.

1 Federal Rule of Criminal Procedure 16(a)(1)(G) requires the government to provide
2 notice of expert testimony. Under the rule requires, the notice must include the following
3 information:

- 4 • a complete statement of the witness' opinions,
- 5 • the bases and reasons for the opinions,
- 6 • the witnesses qualifications, and
- 7 • a list of all other cases in which the witness has testified during the past four
8 years as an expert at trial or by deposition.

9 Fed.R.Crim.P. 16(a)(1)(G)(i) and (iii). The rule also requires the witness to approve and
10 sign the disclosure, unless the government has previously provided a report of examination,
11 signed by the witness, that contains all the opinions and the bases and reasons for opinions
12 as required by the rule. Fed.R.Crim.P. 16(a)(1)(G)(v).

13 To comply with the rule, the United States provides the following information:

- 14 • Ms. Rubino's signed statement of opinions (Attachment G);
- 15 • Information in support of Ms. Rubino's signed statement (Attachments B-E)
- 16 • Ms. Rubino's curriculum vitae (Attachment A); and
- 17 • A list of cases in which Ms. Rubino has testified during the last four years as
18 an expert at trial or by deposition. (Attachment F).

1 The United States reserves the right to supplement this notice as needed.

2 JASON M. FRIERSON
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